

**Hearing Date and Time: January 20, 2010 at 9:45 a.m.**

**Objection Deadline: January 5, 2010 at 5:00 p.m.**

**Reply Deadline: January 14, 2010 at 5:00 p.m.**

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Attorneys for Deutsche Bank AG

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: )  
 ) Chapter 11  
 )  
MOTORS LIQUIDATION COMPANY, *et al.*, ) Case No. 09-50026 (REG)  
 )  
Debtors. ) (Jointly Administered)  
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**NOTICE OF HEARING ON MOTION OF DEUTSCHE BANK AG  
FOR RELIEF FROM AUTOMATIC STAY TO EFFECT SETOFF**

PLEASE TAKE NOTICE THAT Deutsche Bank AG (“**Deutsche Bank**”) has  
filed the Motion of Deutsche Bank for Relief from Automatic Stay to Effect Setoff  
(the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “**Hearing**”) to consider  
the relief requested in the Motion has been scheduled for 9:45 a.m. (Eastern Time) on January  
20, 2010, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in the United  
States Bankruptcy Court for the Southern District of New York, One Bowling Green,  
Courtroom 621, New York, New York, 10004-1408.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must:  
(a) be made in writing; (b) comply with the Bankruptcy Code, the Bankruptcy Rules and the

Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York; (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) (i) electronically by registered users of the Bankruptcy Court's case filing system, or (ii) on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) by all other parties in interest; (d) be submitted in hard copy form to the chambers of the Honorable Robert E. Gerber, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 621, New York, New York 10004; and (e) be served upon counsel for Deutsche Bank, Bingham McCutchen LLP, 399 Park Avenue, New York, New York 10022-4689 (Attn: Robert M. Dombroff, Esq., Jeffrey S. Sabin, Esq. and Jared R. Clark, Esq.) so as to be received no later than **5:00 p.m. (Eastern Time) on January 5, 2010** (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that only responses made in writing and timely filed and received by the Response Deadline will be considered by the Bankruptcy Court at the Hearing and that if no responses to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: New York, New York  
November 24, 2009

BINGHAM MCCUTCHEN LLP

By: /s/ Robert M. Dombroff  
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